

1 Matthew L. Sharp, Esq. (S.B. #4746)
2 **MATTHEW L. SHARP, LTD.**
3 432 Ridge Street
4 Reno, Nevada 89501
5 Telephone: (775) 324-1500
6 Email: matt@mattsharplaw.com
7 Web: https://mattsharplaw.com/
8 Scott Edward Cole, Esq. (CA S.B. #160744) (*Appearing Pro Hac Vice*)
9 **COLE & VAN NOTE**
10 555 12th Street, Suite 1725
11 Oakland, California 94607
12 Telephone: (510) 891-9800
13 Facsimile: (510) 891-7030
14 Email: sec@colevannote.com
15 Web: www.colevannote.com

10 || Attorneys for Representative Plaintiffs

11 Janice M. Michaels (S.B. #6062)
WOOD, SMITH, HENNING & BERMAN LLP
12 2881 Business Park Court, Suite 200
Las Vegas, Nevada 89128-9020
13 Phone: (702) 251-4100
Fax: (702) 251-5405
14 Email: jmichaels@wshblaw.com

15 | Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA, SOUTHERN DIVISION**

20 MICHAEL KINGEN & KELLEY
21 RAMSEY, individually, and on behalf of
all others similarly situated,

22 Plaintiff,

22 | VS.

24 || WARNER NORCROSS + JUDD LLP,
and DOES 1 through 100, inclusive

25 Defendants.

Case No. 2:22-CV-01374-APG-BNW

CLASS ACTION

**STIPULATION AND [PROPOSED] ORDER
RE: TRANSFER OF VENUE TO THE
WESTERN DISTRICT OF MICHIGAN**

1 The parties, Representative Plaintiff Michael Kingen and Representative Plaintiff Kelley
 2 Ramsey (“Representative Plaintiffs”), and Defendant Warner Norcross + Judd LLP (“Defendant”),
 3 acting through their respective counsel of record, hereby stipulate as follows:

4 **WHEREAS**, Defendant’s principal place of business is located at 900 Fifth Third Center
 5 111 Lyon St., NW, Grand Rapids, Michigan 49503 in the Western District of Michigan;

6 **WHEREAS**, Defendant filed a Motion to Dismiss to Plaintiff’s complaint for lack of
 7 personal jurisdiction;

8 **WHEREAS**, on November 1, 2022, the parties agreed to transfer this Action to the United
 9 States District Court for the Western District of Michigan;

10 **WHEREAS**, transfer of this Action to the United States District Court for the Western
 11 District of Michigan renders Defendant’s Motion to Dismiss moot, and therefore, Plaintiff will not
 12 be filing an Opposition to Defendant’s Motion to Dismiss. The parties request the hearing thereon
 13 be taken off calendar.

14 **IT IS THEREFORE STIPULATED AND AGREED**, by and between the parties hereto,
 15 through their attorneys of record, that this Action should be transferred to the United States District
 16 Court for the Western District of Michigan.

17 **IT IS FURTHER STIPULATED AND AGREED**, by and between the parties hereto,
 18 that in agreeing to this Stipulation Defendant does not waive any rights and/or defenses it has or
 19 may assert in this matter.

20 **IT IS SO STIPULATED.**

22 Dated: November 2, 2022

COLE & VAN NOTE

24 By: /s/ Scott Edward Cole
 25 Attorneys for Representative Plaintiffs

1 Dated: November 2, 2022

WOOD, SMITH, HENNING & BERMAN LLP

2
3 By: */s/ Janice M. Michaels*
4 Attorneys for Defendant

5 **ORDER**

6 The parties having so stipulated, IT IS HEREBY ORDERED that transfer to the United
7 States District Court for the Western District of Michigan is granted and the hearing on
8 Defendant's Motion to Dismiss is vacated.

9
10 **IT IS SO ORDERED.**

11
12 Dated: November 3, 2022


13 Honorable Andrew P. Gordon

COLE & VAN NOTE
ATTORNEYS AT LAW
555 12TH STREET, SUITE 1725
OAKLAND, CA 94607
TEL: (510) 891-9800

15
16
17
18
19
20
21
22
23
24
25
26
27
28